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**From:** Judy Joyce [jjoyce@impact7g.com]  
**Sent:** 3/3/2021 1:45:05 PM  
**To:** Steele, Abigail A CIV USARMY CEMVR (USA) [Abigail.A.Steele@usace.army.mil]  
**CC:** Zehr, Matthew A CIV USARMY CEMVR (USA) [Matthew.A.Zehr@usace.army.mil]; Chris Schwake [christine.schwake@dnr.iowa.gov]; DeLong, Tiffany [delong.tiffany@epa.gov]  
**Subject:** Re: Manatt's MIT Bank Prospectus (2020-1710) Public Notice Comments

Thanks Abby!

Sent from my Verizon, Samsung Galaxy smartphone

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**From:** Steele, Abigail A CIV USARMY CEMVR (USA) <Abigail.A.Steele@usace.army.mil>  
**Sent:** Wednesday, March 3, 2021 7:36:45 AM  
**To:** Judy Joyce <jjoyce@impact7g.com>  
**Cc:** Zehr, Matthew A CIV USARMY CEMVR (USA) <Matthew.A.Zehr@usace.army.mil>; Chris Schwake <christine.schwake@dnr.iowa.gov>; Tiffany DeLong <delong.tiffany@epa.gov>  
**Subject:** RE: Manatt's MIT Bank Prospectus (2020-1710) Public Notice Comments

Judy,

This is what we are looking for in regards to the watershed approach.

A watershed approach when used in selecting sites for mitigation banks is based on:

1. Understanding how ecological processes, such as the movement of water, determine the characteristics and ecological functions in a drainage basin (watershed). NOTE: There are no size limits to the drainage basin used for the analysis. A watershed approach can be used in small drainage basins that are only several square miles in size to entire river basins.
2. Determining the extent to which the processes have been altered (e.g., tiling/farming/loss of wetlands).

3. Identifying areas where these processes can be most effectively restored, and where they need to be protected.

4. Assessing the role restoration/creation of wetlands (Mit Bank) can play in repairing those processes and replacing wetland functions lost in the watershed.

So specifically for this project...what will the net positive impacts be? It appears that the water from this site will flow right into the quarry pond. Does that really have much effect on the watershed? These quarries have created such great impacts to the watershed already...over the past 50+ years. The river was straightened here because of the quarries which caused loss of stream corridor and wetlands. These are the types of impacts specifically to this watershed, along with plenty of others (tiles/loss of wetlands), that should be addressed and is having a bank that has quarries on two of the four sides of the bank the best site? What are the possible impacts of being so close to quarry ponds? They own more than 10,000 other acres, why did they pick this site? I know that they probably wanted something in the Iowa Service Area to help offset some of their own impacts, but that doesn't justify the site selection. This IRT has addressed concerns with other bank prospectus' on site selection/design recently so you are not alone.

This bank will be replacing the lost functions and services of wetlands that are filled. Some of those wetlands are high quality and critical to their watershed. How will this bank replace those when they are already in such a disturbed site that appears not to have high ecological function?

Some of your objectives include:

- Contribute to the long-term health of Iowa's waterways....how?

- Fully compensate for wetland losses in a manner which contributes to the long-term ecological function of the watershed with which the bank is located...how?

Let me know if you have any questions/concerns.

Thanks,

Abby Steele  
Iowa Mitigation Bank Manager  
Regulatory Division, Rock Island District U.S. Army Corps of Engineers  
309-794-5377

-----Original Message-----

From: Judy Joyce <jjoyce@impact7g.com>

Sent: Tuesday, March 2, 2021 9:30 AM

To: Steele, Abigail A CIV USARMY CEMVR (USA) <Abigail.A.Steele@usace.army.mil>

Subject: [Non-DoD Source] RE: Manatt's MIT Bank Prospectus (2020-1710) Public Notice Comments

Abby,

Do you have an example of a mitigation bank prospectus that has address Site Selection using the Watershed Approach? I reviewed a few recent Prospectus and can't find what I think you are looking for. If there isn't a good example, don't worry, I think I have a good idea of what you need.

Cheers,

Judy

-----Original Message-----

From: Steele, Abigail A CIV USARMY CEMVR (USA) <Abigail.A.Steele@usace.army.mil>

Sent: Tuesday, March 2, 2021 7:33 AM

To: Judy Joyce <jjoyce@impact7g.com>  
Cc: Zehr, Matthew A CIV USARMY CEMVR (USA) <Matthew.A.Zehr@usace.army.mil>; Chris Schwake <christine.schwake@dnr.iowa.gov>; Reid Stamer <rstamer@impact7g.com>  
Subject: RE: Manatt's MIT Bank Prospectus (2020-1710) Public Notice Comments

Judy,

I've been out of the office since last Thursday. I will email you about this in a few minutes.

Very Respectfully,

Abby Steele  
Iowa Mitigation Bank Manager  
Regulatory Division, Rock Island District U.S. Army Corps of Engineers  
309-794-5377

-----Original Message-----

From: Judy Joyce <jjoyce@impact7g.com>  
Sent: Tuesday, March 2, 2021 7:19 AM  
To: Steele, Abigail A CIV USARMY CEMVR (USA) <Abigail.A.Steele@usace.army.mil>  
Cc: Zehr, Matthew A CIV USARMY CEMVR (USA) <Matthew.A.Zehr@usace.army.mil>; Chris Schwake <christine.schwake@dnr.iowa.gov>; Reid Stamer <rstamer@impact7g.com>  
Subject: [Non-DoD Source] RE: Manatt's MIT Bank Prospectus (2020-1710) Public Notice Comments

Abby,

Good morning! Hope you are enjoying the warmer weather. I know you have a lot on your plate, but wanted to check with you on this. Our plan is to proceed with the MBI and address the comments from the public notice in it. Let me know if you want to call to discuss.

Cheers,  
Judy

-----Original Message-----

From: Judy Joyce  
Sent: Thursday, February 25, 2021 3:05 PM  
To: 'Steele, Abigail A CIV USARMY CEMVR (USA)' <Abigail.A.Steele@usace.army.mil>  
Cc: Zehr, Matthew A CIV USARMY CEMVR (USA) <Matthew.A.Zehr@usace.army.mil>; Chris Schwake <christine.schwake@dnr.iowa.gov>; Reid Stamer <rstamer@impact7g.com>  
Subject: RE: Manatt's Mit Bank Prospectus (2020-1710) Public Notice Comments

Abby

Good afternoon! I need some help/clarification on the process. In the guidelines it states:

"Prospectus - The Corps will evaluate the prospectus for completeness, and if necessary, request additional information. If the prospectus is complete, a public notice will be posted within 30 days of receiving the complete prospectus. The public notice comment period is typically 30 days. The IRT will evaluate the prospectus and any comments received during the public notice comment period. The Corps will provide the Sponsor with an initial evaluation letter (providing comments on the likelihood of bank success) within 30 days of the close of the public comment period."

In the past, the (Final) Prospectus went out for public notices and after the public notice, we received comments/evaluation letter. These comments were then addressed them in the MBI. Is this not still the process?

I will call to discuss.

Cheers,  
Judy

-----Original Message-----

From: Steele, Abigail A CIV USARMY CEMVR (USA) <Abigail.A.Steele@usace.army.mil>  
Sent: Wednesday, February 24, 2021 8:22 AM  
To: Judy Joyce <jjoyce@impact7g.com>  
Cc: Zehr, Matthew A CIV USARMY CEMVR (USA) <Matthew.A.Zehr@usace.army.mil>; Amber Schorg <amber\_schorg@fws.gov>; Chris Schwake <christine.schwake@dnr.iowa.gov>; USEPA Region 7 <r7-cwa404@epa.gov>; Sindra Jensen <sindra.jensen@usda.gov>; Tiffany DeLong <delong.tiffany@epa.gov>  
Subject: Manatt's Mit Bank Prospectus (2020-1710) Public Notice Comments

Judy,

Please see the attached Public Notice comments on the Manatt's Mitigation Bank Prospectus (2020-1710). Please utilize track changes to document where each of the comments are addressed in the submittal of the final Prospectus.

We have not yet issued an evaluation letter for this bank site. We will further evaluate the site and plan and provide you with an evaluation once you have addressed our comments/concerns.

Please let me know if you have any questions.

Thanks.

Abby Steele  
Biologist  
Regulatory Branch, Rock Island District  
U.S. Army Corps of Engineers  
309-794-5377